

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS**

| | | |
|---------------------------------|---|-----------------------------|
| WILLIAM AMOR, |) | |
| |) | |
| <i>Plaintiff,</i> |) | Case No. 20-cv-01444 |
| |) | |
| v. |) | Hon. John Z. Lee |
| |) | |
| JOHN REID & ASSOCIATES, et al., |) | Mag. J. Jeffrey I. Cummings |
| |) | |
| <i>Defendants.</i> |) | |

JOINT STATUS REPORT

Plaintiff, William Amor, and Defendants, John Reid & Associates, Michael Masokas, and the Estate of Arthur Newey, jointly submit the following status report, pursuant to this Court's order on April 9, 2021. *See* Dkt. 49.

(A) Progress of the Litigation

Since they were last in front of the Court on April 9, 2021, Defendants have entered an answer to Plaintiff's First Amended Complaint. *See* Dkt. 50. The parties have also conferred on both the need to appoint a special representative for the Estate of Arthur Newey, as well as a proposed discovery schedule for the outstanding case.

(B) Outstanding Special Representative for Newey Estate

Defendants believe that the daughter of Arthur Newey, Katelyn Newey, will be both willing and adequate to serve as the special representative. Once Katelyn Newey confirms her ability to do so, the parties will file a joint motion seeking leave to name her special representative.

(C) Agreed Proposed Discovery Schedule

Parties believe that the following discovery is necessary in this case: written discovery, limited oral discovery, and expert discovery. As such, parties propose the following discovery schedule for the Court's consideration:

- Initial Disclosures: June 7, 2021
- Fact Discovery Deadline: October 24, 2021
- Plaintiff's 26(a)(2) Disclosures Due: November 31, 2021
- Defendants' Deadline to Depose Plaintiff's Experts: January 7, 2022
- Defendant's 26(a)(2) Disclosures Due: February 11, 2022
- Plaintiff's Deadline to Depose Defendants' Experts: March 25, 2022
- Deadline for Rebuttal Experts: April 8, 2022
- Deadline to Depose Rebuttal Experts: April 22, 2022
- Deadline for Motions for Summary Judgement: June 10, 2022.

Dated: May 10, 2021

Respectfully submitted,

/s/ Mariah Garcia

Attorney for Plaintiff

Jon Loevy

Gayle Horn

Mariah Garcia

Loevy & Loevy

311 N. Aberdeen St., 3rd Floor

Chicago, Illinois 60607

(312) 243-5900

mariah@loevy.com

/s/ Jonathan Goken

Attorney for Defendants

Jonathan W. Goken (Bar ID: 6278837)

F. Michael Pasqualino (Bar ID: 6311292)

Lewis Brisbois Bisgaard & Smith LLP

550 W. Adams St. Suite 300

Chicago, Illinois 60661

(312) 345-1718

Jonathan.Goken@lewisbrisbois.com

F.Pasqualino@lewisbrisbois.com